

FILED

2/14/2020

FILEDNOV 14 2019 *W*THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTIn THE UNITED STATES
DISTRICT COURT FOR THE
NORTHERN DISTRICT OF
ILLINOIS

David Morris (#20150721256)

Plaintiff,

Vs.

P. Jones et al.

Defendants,

Case No. 18 C 4720

Honorable Judge
Marth M. PacoloAMENDED COMPLAINT
Motion for Leave to File an
AMENDED COMPLAINTPlaintiff, David Morris, pursuant to Rule (15)(a),
Fed. R. Civ. P., requests leave to file an amended
complaint adding party's.Complaint under the Constitution ("Bivens" Action),
Title 28 Section 1331 U.S. Code (Federal defendants)

I. Plaintiff:

A) Name: David Morris

ON
(#20150721256)

B) Prisoner identification number: (#20150721256)

C) Place of present confinement: (CCDOC) Cook County Jail

D) Address: P.O. Box 089002, Chicago ILL. 60608

II. Defendants:

A.) Defendant: P. Jones

Title: Superintendent

Place of Employment: Cook County Jail (CCDOC)

B.) Defendant: Thomas Dart

Title: Sheriff

Place of Employment: Daily Center ^{50 W. Washington} ~~200 W. Washington~~

C.) Defendant: d. Wedel

Title: C/O Correctional officer

Place of Employment: Cook County Jail (CCDOC)

D.) Defendant: G. Morris

Title: C/O officer

Place of Employment: Cook county jail (CCDOC)

E.) Defendant: D. Fugiel

Title: C/O officer

Place of Employment: Cook County Jail (CCDOC)

F.) Defendant: M. Spizzirri

Title: C/O officer

Place of Employment: Cook county jail (CCDOC)

G.) Defendant: Sgt. White

Title: Sergeant

Place of Employment: Cook County Jail (CCDOC)

H. Defendant: Lt. Pzanes

Title: lieutenant

Place of Employment: Cook County Jail (CCDOC)

I. Defendant: Un-Named Officers (Jon-

Title: c/o Officers

Place of Employment: Cook County Jail (CCDOC)

III. List All lawsuits you have filed in any state or Federal court in the United States:

1) NONE.

IV. Statement of Claim:

I David Morris, an inmate of the Cook County jail was housed in Division 9 tier 2G in 2016, for about 2-3 months. During the time I was housed on 2G I was having problems with several detainees who claimed that since I wasn't "Gang" that they were going to rob me and, they also had been threatening to jump me and literally spit in my A** to deprive me of my manhood. So as directed by the CCDOC Handbook I reported it to staff who's reply was, that there is nothing that they could do about simple threats. The threatening went on for a few more days until someone stole my glasses and a few items of my commissary. A few days later I had dispensary and happened to come across Superintendent P. Jones of Div 9, Whereas I informed him of the threats I was receiving. I supplied him with the names and details of the events that already took place. His reply was "I don't have time for this" after more pleading from myself he then responded "That's not my problem," I then stated that I already spoke to my tier officer ~~and~~ who at the time was officer G. Morris #17686, and the Sergeant, who told me not to worry about it.

I was still very much in fear for my safety, which is why I was now speaking to the Superintendent, who had the power to relocate me but instead chose to walk away. Later that, on Dec 19, 2016, 3-11pm Shift (Every time Shift changes the New officer is supposed to do a count, and a security check, to make sure all inmates are accounted for and all doors are locked.) (Furthermore in Div-9 there is a top deck and a bottom deck, due to security reasons they are not allowed to be out at the same time.) So the time is split between the two 3 hours top 3 hours bottom) On this day Dec 19 2016 3-11pm, Officer G. Morris #17686 and his backup officer M. Spizzirri #17807 failed to do the lock check even after being informed of my fears, ~~because of this~~ Because of this indifference, while I was in the Dayroom 8-12 inmates exited their cells, (cell's wasn't locked) and started to do exactly what I've been afraid of, jump me, Punching and kicking me in the face, back, among other places. While this was taking place, I could see CO's standing by watching from the safety of the interlock door. CO's who I can now identify as G. Morris, M. Spizzirri, J. Wedel # 17957, D. Fugiel # 17873, Sgt. White # 3156, Lt. Pzanes # 608, and many other officers I can not identify. As these CO's watched, while not providing any help, one of the

inmates Willie Mims # 20140814302 pulled out a sharp metal object and began stabbing me everywhere (Neck, back, face) As this was going on again I tried to get off the tier, I ran to the interlock door. The officers didn't open the door as I begged for help. If Sheriff Thomas Dart, wrote that, or ~~was~~ set that policy, I believe he should be held liable as well, and I do believe that our sheriff sets all policy's. After a while 3-7 minutes later the inmates began to return to their cell on their own. One of the white shirts (either Sgt. White or Lt. Pzanes) finally gave the order for the officers to intervene and drag me off the tier. ~~They released me from the tier.~~ I was then taken to the hospital and treated for stab wounds, headconcussion, among other things. Upon being released from the hospital I was taken back to Division 9. Where again I told the officers, and, Sgt, and Lt. I was afraid for my life, yet again they told me not to worry. I'm going to be going to a different tier. Well when I got to this New tier, the same detainees were on this tier as well. Needless to say they jumped me again. I wrote several grievances asking for separation from the people involved. They haven't done anything about it. I've been housed with these same people more than once. Every day I have to live in fear that I will be placed in danger and get jumped on or stabbed again.

Most recently I've been house with Kevin McEason #20130712211, who is most definite a hazard to my health. Since then I've gone into Deep Depression, and now I have mental health problems, and I can't sleep without med, because everytime I close my eye's I picture myself getting stabbed and beaten. I shouldn't have to live in fear. I am supposed to be under CCDOC's protection yet they don't do anything to help.

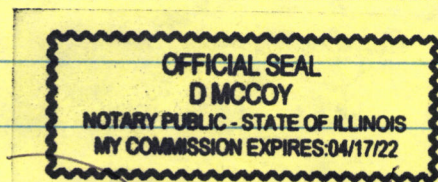
v.) Relief:

I would like for CCDOC to be held responsible for each stab wound. I am asking for the amount of 1.2 million Dollars against each defendant, jointly and severally for ~~compensatory~~ compensatory damages. Punitive damages in the amount of five hundred thousand against each defendant.

vi.) Plaintiff demands a trial by a jury.

27 Oct. 2019
David Morris
David Morris
#20150721256

CCDOC
PO BOX 089002
Chicago IL 60608



[Signature] 10/28/19

David Morris #20150721256
PO Box 089002
Chicago IL 60608



11/13/2019-4

FOREVER
USA



Barn Swallow

NOV 13 2019
Prisoners Correspondence

Clerks Office
U.S. District Court
219 S. Dearborn St.
Chicago, IL 60604
20th Floor

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